

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

APPLE INC.)	
)	
Plaintiffs and Counterclaim)	
Defendants,)	Case No. 1:11-cv-178 (BBC)
)	
)	
v.)	
)	
MOTOROLA MOBILITY, INC.)	
)	
Defendants and Counterclaim)	
Plaintiffs.)	

**MOTOROLA MOBILITY, LLC’S MOTION IN LIMINE TO EXCLUDE ANY
EVIDENCE OR ARGUMENT RELATED TO ANY ALLEGEDLY
“NON-INFRINGEMENT ALTERNATIVES” TO MOTOROLA U.S. PATENT NOS.
5,311,516, 6,175,559, AND 6,359,898**

Defendants Motorola Mobility, LLC hereby move this Court, pursuant to Federal Rules of Civil Procedure, the Federal Rules of Evidence and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), for entry of an order precluding Plaintiff Apple, Inc. from presenting any argument or evidence at trial related to any purportedly “non-infringing alternatives” to Motorola’s U.S. Patent Nos. 5,311,516, 6,175,559, and 6,359,898. Motorola’s Motion is based upon the Motion, the Memorandum in Support of Motorola’s Motion, and all cited record references therein.

Dated: September 28, 2012

Respectfully Submitted,

MOTOROLA MOBILITY, LLC.

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